

Procedures for Requesting a Data Standard Conformance Waiver

Office of Information Collection/Data Standards Branch

The purpose of this document is to (1) identify key elements of the waiver application process; (2) specify and define procedures that Program Offices, Regions, and Laboratories should use when applying for a waiver; and (3) identify the implications of non-conformance.

Background

Data standards are documented agreements on the format and definition of common data. EPA's Data Standards Program promotes efficient sharing of environmental information among the Agency, States, Tribes, and other information trading partners through the cooperative development of data standards to foster the use of consistently defined and formatted data elements and sets of data values. Employing common terminology and common data element definitions enables the eventual integration of databases, and promotes public access to commonly defined data from disparate sources. By using data standards, Agency managers and the public can more quickly and accurately assess environmental performance, maximize use of resources, and improve data integrity.

Because data standardization is critical to information integration efforts, provision for data standard conformance waivers will only be granted in those instances where they are clearly warranted. In general, it is anticipated that Agency information systems will conform to data standards relevant to those systems.

1. Key Elements of the Waiver Process

- Applications for waivers must be made in writing by the Program Office's Senior Information Resources Management Officer (SIRMO) (or comparable Regional or Laboratory official) to the Chief Information Officer (CIO). Copies must be sent to the Collection and Access Policy Subcommittee (CAPS) of the Quality and Information Council (QIC) and the Data Standards Branch Chief, Office of Information Collection.
- Applications for both temporary and permanent waivers will be considered.
- Applications must identify risks and costs associated with non-conformance.
- Each Application may address only one standard and one system at a time. Applications that request a waiver for a single standard within multiple information systems, or multiple standards within a single information system, will not be accepted.
- Evaluation criteria used in consideration of waiver disposition will include, but are not limited to:
 1. Applicability - systems not exchanging data;
 2. Timing - systems that will be discontinued and instances where modernization is ongoing; and
 3. Burden - significant impact on the regulated community and/or information trading partners.
- The Agency's CIO has sole authority to grant waivers.

- The CIO has 60 days to notify the applying office of the disposition of the waiver.

2. Waiver Application Procedures

Step 1. Determination of Need. The Program Office's SIRMO and other relevant decision officials determine whether they will meet data standard conformance deadlines. These deadlines are found in the business rules documents posted in the data standards section of the Environmental Data Registry. The Program Office must formally apply for a waiver in those instances where pending data standard conformance is not possible or not warranted.

Step 2. Submission of Waiver Request. Applications for waivers are to be made by the SIRMO in writing to the CIO. A copy also must be sent to the Data Standards Branch (DSB) Chief and the Co-chairs of the CAPS. Waiver applications must:

- Identify the system affected and the standard of concern;
- Indicate whether the request is for a temporary or permanent waiver. Applications requesting a temporary waiver must indicate when the system will conform with the standard. Applications for a permanent waiver must include reasons why the data element(s) should not be implemented;
- Identify any risks associated with continued non-conformance; and
- Assess the cost-effectiveness of continued non-conformant operation.

Each application for a waiver may address only one standard and one system. In cases where multiple standards or systems are affected, a separate application is required for each individual standard and system involved. Applications that address multiple standards and/or systems will not be accepted.

Submissions need to be made on EPA letterhead in memorandum format, along with any necessary documentation. E-mail submissions will not be accepted.

Step 3. Disposition of Waiver Request. The DSB will evaluate applications and make advisory recommendations to the CIO. The DSB will consult with data standard stewards and the CAPS/QIC as needed. Evaluation criteria used in consideration of waiver disposition will include, but are not limited to, applicability, timing, and burden on the regulated community and/or information trading partners.

The CIO shall notify the SIRMO of the applying office in writing of the disposition of the application within 60 days of receipt. For a temporary waiver request, the CIO will indicate the date by which the system is to conform to the standard.

3. Potential Implications of Non-Conformance with Data Standards

- Reduced funding and/or system development or O&M restrictions from the Capital Planning Investment and Control (CPIC) process; and limited

participation in Agency-wide information technology functions such as the Network.